

## SUPPLEMENTAL MEMO TO THE HEARING OFFICER

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DATE ISSUED: November 22, 2023

HEARING DATE: December 5, 2023                      AGENDA ITEM: 6

PROJECT NUMBER: PRJ2021-003767-(2)

PERMIT NUMBER(S): Yard Modification RPPL2021010501

SUPERVISORIAL DISTRICT: 2

PROJECT LOCATION: 5322 West 119th Place, Del Aire

OWNER: Sofia Sweetheart, LLC

APPLICANT: Lida Benham

CASE PLANNER: Sean Donnelly, Senior Planner  
Sdonnelly@planning.lacounty.gov

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Item No. 6 is an application for a Yard Modification to authorize the continued maintenance of a wall in the side yard setback that exceeds the maximum six-foot allowable height in the R-1 Zone ("Project"). This Project is located at 5322 West 119th Place in the Del Aire community. This project was continued from the September 5, 2023 and October 3, 2023 Hearing Officer's meetings.

### APPLICANT REQUEST FOR CONTINUANCE

On September 25, 2023, the representatives of the Applicant submitted a request to the Hearing Officer for a continuance of the hearing from December 5, 2023. The Applicant's request is related to them being out of the country. The request is to continue this Project until after their return in February.

### PUBLIC CORRESPONDENCE

On September 5, 2023, the representatives of Jung and Young Park, owners of 5318 West 119<sup>th</sup> Place submitted a letter of opposition to the Project. The letter also opposes a continuance of the Project until after pending civil litigation is resolved, as was previously requested by the applicant.

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Report  
Reviewed By: Michele R. Bush for Carmen Sainz  
Carmen Sainz, Supervising Regional Planner

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Report  
Approved By: *Carmen Saing* for Mitch Glaser  
Mitch Glaser, Assistant Deputy Director

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Attachments: Applicant email dated September 25, 2023  
Public Correspondence dated September 5, 2023

Re: Project No. PRJ2021-003767-(2) Yard Modification No. RPPL2021010501

Sean Donnelly <SDonnelly@planning.lacounty.gov>

Thu 9/28/2023 5:59 PM

To:Lida Travel Inc <lidatravel@gmail.com>;Susan Rousier <Susan@sullivanlitigators.com>;Paul Sullivan <cecilia@sullivanlitigators.com>

Cc:sal@darlaw.com <sal@darlaw.com>

Hi Lida,

We will be keeping the December date at this time. A continuance can be requested for the hearing officer to consider by emailing comment@planning.lacounty.gov.

Thanks,

**SEAN DONNELLY** (he/him/his)

**SENIOR PLANNER, Foothills Development Services**

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**From:** Lida Travel Inc <lidatravel@gmail.com>

**Sent:** Monday, September 25, 2023 8:29 AM

**To:** Sean Donnelly <SDonnelly@planning.lacounty.gov>; Susan Rousier <Susan@sullivanlitigators.com>; Paul Sullivan <cecilia@sullivanlitigators.com>

**Cc:** sal@darlaw.com <sal@darlaw.com>

**Subject:** Re: Project No. PRJ2021-003767-(2) Yard Modification No. RPPL2021010501

**CAUTION: External Email. Proceed Responsibly.**

*Hi Sean,*

*We booked our flights to be out of the Country in December and part of January for the family emergency. I am going to be in a remote area with little to no wifi reception  
DO you have another date available in February?*


Regards,

Trip Locator: **2OWUP6**

Lida

**LIDA BEHNAM, SOFIA BEHNAM**

**Booked Aug, 1, 2023**

Flight: Friday, 1 December 2023		Airline Reference: VG8D73
Los Angeles (LAX) to Istanbul (IST)		
 TK0180	Turkish Airlines <b>Depart</b> Los Angeles Int'l Airport Los Angeles, CA, US Friday, 1 December 2023	<b>Arrive</b> Istanbul Airport Istanbul, TR Saturday, 2 December 2023 <b>12:50 PM</b>
		Status: <b>Confirmed</b> Cabin Class: <b>-Economy Class</b> Duration: <b>13h 05m</b> Miles Flown: <b>6858</b> Aircraft: <b>789</b>

12:45 PM  
Terminal B

Meal Service: **Meal**

Passenger(s)	Seat	Requested Services
LIDA BEHNAM	--	NONE
SOFIA BEHNAM	--	NONE

Flight: Friday, 19 January 2024

Airline  
Reference:  
VG8D73

Istanbul (IST) to Los Angeles (LAX)



Turkish Airlines

**Depart**

Istanbul Airport  
Istanbul, TR  
Friday, 19 January 2024  
**1:50 PM**

**Arrive**

Los Angeles Int'l Airport  
Los Angeles, CA, US  
Friday, 19 January 2024  
**4:45 PM**  
Terminal B

Status: **Confirmed**

Cabin Class: **-Economy Class**  
Duration: **13h 55m**  
Miles Flown: **6858**  
Aircraft: **77W**  
Meal Service: **Meal**

Passenger(s)	Seat	Requested Services
LIDA BEHNAM	--	NONE
SOFIA BEHNAM	--	NONE

TICKET RESTRICTION  
NON/CHANGE/NON/REFUNDABLE

HS\*E2357805204607

HS\*E2357805204607

On Thu, Sep 21, 2023 at 12:47 PM Sean Donnelly <[SDonnelly@planning.lacounty.gov](mailto:SDonnelly@planning.lacounty.gov)> wrote:

Good Afternoon,

[A memo has been issued](#) for your project scheduled for the October 3, 2023 Hearing Officer meeting. Staff is requesting a continuance until December 5, 2023 due to a scheduling conflict.

Please let me know if you have any questions.

have a great day,

**SEAN DONNELLY** (he/him/his)

**SENIOR PLANNER, Foothills Development Services**

Office: (213) 974-6411 • Direct: (213) 893-7024

Email: [sdonnelly@planning.lacounty.gov](mailto:sdonnelly@planning.lacounty.gov)

Los Angeles County Department of Regional Planning  
320 West Temple Street, 13<sup>th</sup> Floor, Los Angeles, CA 90012  
[planning.lacounty.gov](http://planning.lacounty.gov)



*Our [field offices](#) are currently open to the public. Please visit [planning.lacounty.gov](http://planning.lacounty.gov) for information about available services, public meeting schedules, and planning projects.*


## RPPL2021010501 - Lida Behnam - Yard Modification - Potential Ongoing Continuation

Sara Wang <swang@vervelaw.com>

Tue 9/5/2023 6:28 PM

To: Sean Donnelly <SDonnelly@planning.lacounty.gov>

Cc: Mitch Glaser <mglaser@planning.lacounty.gov>; Diane Temple <dtemple@planning.lacounty.gov>; Alex Chang <achang@vervelaw.com>

 1 attachments (3 MB)

2023-09-05 Ltr to LA County RPP Sean Donnelly re Continuation.pdf;

**CAUTION: External Email. Proceed Responsibly.**

Dear Mr. Donnelly,

My name is Sara Wang and I am an attorney for Jung and Young Park, the neighbors of Lida Behnam. I was present at the public hearing today.

Please find attached a letter concerning some of the issues that arose at the hearing today, in particular as to the Department of Regional Planning's consideration of continuing the hearing and decision on Lida Behnam's Yard Modification until the pending civil litigation is resolved. As set forth in more detail in my letter, the Los Angeles Superior Court has actually already indicated that it is waiting for resolution with your Department.

Thank you for your time and consideration. A response would be greatly appreciated. Please feel free to reach me by email or phone at your convenience.

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Best regards,

**Sara B. Wang** | VERVE LAW GROUP, LLP

5841 Beach Blvd., Buena Park, CA 90621

Office Tel: 714.980.4450

Fax: 714.980.4451

[swang@vervelaw.com](mailto:swang@vervelaw.com) | [www.vervelaw.com](http://www.vervelaw.com)

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***Via E-mail***

Sean Donnelly  
cc: Mitch Glaser, Diane Temple  
Los Angeles County, Department of Regional Planning  
320 West Temple St., 13<sup>th</sup> Floor  
Los Angeles, CA 90012  
Email: Sean Donnelly <SDonnelly@planning.lacounty.gov>  
Diane Temple <dtemple@planning.lacounty.gov>  
Mitch Glaser <mglaser@planning.lacounty.gov>

September 5, 2023

**Re: RPPL2021010501- Lida Behnam – Yard Modification Application; Request to Not Pursue an Ongoing Continuation of Hearing and Decision**

Dear Mr. Donnelly,

My name is Sara Wang and I am an attorney for Jung Park and Young Park who own 5318 West 119th Pl, Inglewood, CA 90304 (APN 4140-011-009) (the “Park Property”). We represent them in the pending litigation in which they are the Plaintiffs, *Park, et al. v. Sofia Sweetheart, LLC, et al.*, LASC Case No. 22STCV29381. In this lawsuit, the Parks are, in part, suing their neighbors Defendants Lida Behnam, Sofia Behnam, and Sofia Sweetheart, LLC, who are located at 5320 and 5322 West 119th Pl., Inglewood, CA 90304 (APN 4140-011-008) (the “Behnam Property”), concerning a Reciprocal Driveway Easement (the “Easement”) of 5’ from both properties that runs between for ingress and egress by pedestrians and vehicles. The Easement is absolutely necessary for the Parks to access their only parking garage at the back of their property. The Parks allege that Defendants have intentionally and maliciously interfered with their access to the Easement in a number of ways, including the extension of the CMU wall by approximately 11 feet in length which impedes vehicles from entering/exiting their garage, installation of a large metal gate on the Easement, extensions to the height of said wall and an attached metal gate with vinyl and blue tarp and PVC pipe that exceeds the permitted height of six feet, as well as obstructions to their entrance to the Easement from the curb cut on West 119th Place (the “curb cut”). The Parks have obtained a Preliminary Injunction from the Court granting them access to the Easement and that it be free of obstructions. (Exhibit A - 5/19/23 Preliminary Injunction).

I was able to attend today's public hearing regarding Ms. Behnam's Yard Modification Application RPPL2021010501, Agenda No. 5. From my understanding of the prepared Report to the Hearing Officer, the department recommends denying Ms. Behnam's application to

retroactively permit construction relating to the brick wall between the Park and Behnam Properties as to:

- (1) The height (extensions that bring the wall to between 9 and 11 feet high), as "the property is flat and rectangular in shape, with no topographic features or other site conditions which would make it impractical to comply with the six-foot height requirement" (Report at p.6); and
- (2) Ms. Behnam's additional length (of 10 ft 11 inches) to the brick wall, as it "results in inadequate maneuvering ailes from the existing driveway on the Project Site to its associated garage, and from the existing driveway on the adjoining property to the east to its associated garage, pursuant to County Code Section 22.112.080.B.2." (Report at p. 6)

### **Continued Hearing to October 3, 2023**

I understand that the hearing was continued to October 3, 2023 per Ms. Behnam's request due to a medical appointment. I assume this continued hearing would also be at 1pm? I would greatly appreciate it if any notices of that hearing or reports be sent to me as well for the Parks.

### **The Hearing And Decision By The Department of Regional Planning Should Not Be Continued Until After the Resolution of the Pending Civil Litigation**

Most importantly, I also heard discussion of a request that the public hearing be further continued until after the pending litigation is resolved in the Los Angeles Superior Court. However, I wanted to make you aware that Judge Patrick Dillion, presiding, has already indicated that he is awaiting the decision of your administrative branch. (Exhibit B - 5/5/23 Minute Order; Exhibit A - 5/19/23 Preliminary Injunction Order). Furthermore, a hearing and decision by the Department of Regional Planning on these issues is actually first needed to resolve issues and claims within the civil litigation:

(1) The Court's 5/5/23 Minute Order and 5/19/23 Preliminary Injunction declined to rule on issues relating to the height and length extensions to the brick wall at that time, without prejudice, because it wanted to know, in part, "(ii) the status of the County's notice of violation and related enforcement efforts and whether the County's administrative jurisdiction is exclusive," (Exhibit B - 5/5/23 Minute Order at Paragraph 3; *See also* Exhibit A - 5/19/23 Preliminary Injunction Order at p.4, Section A).

(2) Ms. Behnam has claimed that your Department granted a permit for the additional 10 ft 11 inches of wall that she built. (Exhibit C - Behnam's Responses to Special Interrogatories (Set One)). Ms Behnam has offered that she "obtained permits for the brick wall and all extensions which were inspected and approved by the proper governmental agencies. The brick wall has been in place since 1946 and the extension was permitted in 2019." (Special Interrogatories No. 16, 18).

However, the Report to the Hearing Officer clarifies that "SPR No. RPPL2021002885, approved on April 20, 2021, depicted an existing five-foot-tall and approximately 50-foot-long wall along the Project Site's eastern property line and a new 10-foot-11-inch long extension of the wall to the north along the eastern property line. However, the scope of this approval was limited to a new Junior Accessory Dwelling Unit ("JADU") attached to the single-family residence and the SPR did not approve this wall extension. The current Project proposes to



legalize this additional section of the wall and add the four-foot-tall vinyl screen to the entire length." (Report at p.2).

The issue of whether the additional length of the brick wall is permitted, previously or retroactively, can only be resolved by a decision of the Department of Regional Planning, as it is not in the purview of the Los Angeles Superior Court to grant or deny such permits.

(3) Both the Parks and Behnam's property surveys conducted in the pending litigation show that, in actuality, 0.6' of the wall lays on the Park Property while in comparison only 0.1' is on the Behnam Property. (Exhibit D - Parks' Survey by Land and Air Surveying; Exhibit E - Behnam's Survey by Voorheis & Voorheis, Inc.). Therefore, the County cannot knowingly retroactively grant a permit for a wall that was primarily built on another's person's property and aid this encroachment. Ms. Behnam's pending application for the length of the brick wall must be denied on this basis, in addition to the Department's findings that the length extension "results in inadequate maneuvering aisles."

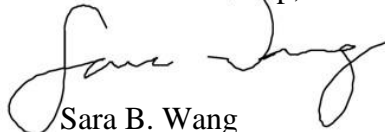
(4) The County's decisions on retroactively granting permits for both the height extensions exceeding six-feet and the additional 10ft 11 inches of brick wall length are imperative to and must come before any decision by the Los Angeles Superior Court. The Court is literally unable to resolve pending litigation issues until a decision is first made by the Department of Regional Planning on whether these extensions are permitted or not, which again, the Parks offer that they should not be for the reasons above.

I respectfully request that the Department of Regional Planning not seek to continue a decision on Ms. Behnam's yard modification application until after the pending civil litigation is resolved, as the Court has already indicated that it is awaiting your final decisions on these permits that are within the Department of Regional Planning's administrative duties. It would literally be putting the cart before the horse.

Should you have any questions or concerns you can reach me by telephone at 714.980.4450 or by email at [swang@vervelaw.com](mailto:swang@vervelaw.com).

Very truly yours,

Verve Law Group, LLP



Sara B. Wang

# EXHIBIT A

ATTORNEY OR PARTY WITHOUT ATTORNEY: STATE BAR NO.:  
 NAME: Jeffrey Gwynn (SBN 180548); Alex Chang (SBN 247921); Sara Wang (244893)  
 FIRM NAME: Verve Law Group, LLP  
 STREET ADDRESS: 5481 Beach Blvd.  
 CITY: Buena Park STATE: CA ZIP CODE: 90621  
 TELEPHONE NO.: (714) 980-4450 FAX NO.: (714) 980-4451  
 E-MAIL ADDRESS: jgwynn@vervelaw.com; achang@vervelaw.com; swang@vervelaw.com  
 ATTORNEY FOR (name): Plaintiffs Jung Park and Young Park

FOR COURT USE ONLY

**FILED**  
 Superior Court of California  
 County of Los Angeles  
**05/19/2023**  
 David W. Slayton, Executive Officer / Clerk of Court  
 By:           M. Carino           Deputy

**SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES**  
 STREET ADDRESS: 111 N. Hill St.  
 MAILING ADDRESS: 111 N. Hill St.  
 CITY AND ZIP CODE: Los Angeles 90012  
 BRANCH NAME: Central District - Stanley Mosk Courthouse

CASE NUMBER:  
 22STCV29381

PLAINTIFF/PETITIONER: Jung Park and Young Park  
 DEFENDANT/RESPONDENT: Sofia Sweetheart LLC; et al.  
 OTHER:

JUDICIAL OFFICER:  
 Hon. Timothy Patrick Dillon

**PROPOSED ORDER (COVER SHEET)**

DEPT:  
 73

Electronically Received 05/15/2023 02:48 PM

**NOTE:** This cover sheet is to be used to electronically file and submit to the court a proposed order. The proposed order sent electronically to the court must be in PDF format and must be attached to this cover sheet. In addition, a version of the proposed order in an editable word-processing format must be sent to the court at the same time as this cover sheet and the attached proposed order in PDF format are filed.

1. Name of the party submitting the proposed order:  
 Plaintiffs Jung Park and Young Park
2. Title of the proposed order:  
 Order on Plaintiffs Jung Park and Jung Parks Motion for a Preliminary Injunction
3. The proceeding to which the proposed order relates is:
  - a. Description of proceeding: Motion for Preliminary Injunction
  - b. Date and time: May 4, 2023, 8:30 a.m.
  - c. Place: Dept. 73 (of Stanley Mosk Courthouse)

On May 9, 2023  
 attached

4. The proposed order was served on the other parties in the case. On May 15, 2023, counsel for Plaintiffs were served with Defendants' Objection to the proposed order. However, in their Objection, Defendants specifically objected to a prior proposed order that was submitted along with the initial motion papers, not the proposed order that was prepared in accordance with the Court's May 5, 2023 Minute Order and served on May 9, 2023.

Alexander J. Chang  
 \_\_\_\_\_  
 (TYPE OR PRINT NAME)

  
 \_\_\_\_\_  
 (SIGNATURE OF PARTY OR ATTORNEY)

Electronically Received 05/15/2023 02:48 PM

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**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF LOS ANGELES – STANLEY MOSK COURTHOUSE**

JUNG PARK, an individual; and YOUNG PARK, an individual,

Plaintiffs,

v.

SOFIA SWEETHEART LLC, a California limited liability company; LIDA BEHNAM, an individual, and SOFIA BEHNAM, an individual; and DOES 1 through 20, inclusive,

Defendants.

Case No.: 22STCV29381

Assigned for all purposes to:  
Judge: Hon. Timothy Patrick Dillon  
Dept.: 73

**[PROPOSED] ORDER ON PLAINTIFFS JUNG PARK AND YOUNG PARK'S MOTION FOR A PRELIMINARY INJUNCTION**

Date: May 4, 2023  
Time: 8:30 a.m.  
Dept.: 73  
Judge: Hon. Timothy Patrick Dillon  
Reservation ID: 981253852334

Complaint filed: September 9, 2022  
Trial Date: April 24, 2024

On May 4, 2023, the Court heard the Plaintiffs JUNG PARK and YOUNG PARK’s (“Plaintiffs”) Motion for a Preliminary Injunction against SOFIA SWEETHEART LLC, a California limited liability company, LIDA BEHNAM, and SOFIA BEHNAM (collectively

//

1 “Defendants”). Upon reading the submitted papers and considering arguments of counsel and the  
2 parties, and after taking the matter under submission, the Court finds as follows:

3 (1) There is good cause to believe that the easement, recorded in the Office of Los  
4 Angeles County Recorder on February 9, 1994 (the “Reciprocal Driveway Easement”), that runs  
5 between Plaintiffs’ property located at 5318 West 119<sup>th</sup> Place, Inglewood, California 90304 (the  
6 “Park Property”) and Defendants’ neighboring property located at 5322 and 5320 West 119<sup>th</sup>  
7 Place, Inglewood, California 90304 (the “Sweetheart Property”), as depicted in the Plaintiffs’  
8 Survey, a copy of which is attached hereto as *Exhibit A* and incorporated herein by this reference,  
9 and in Defendants’ Survey, a copy of which is attached hereto as *Exhibit B* and incorporated  
10 herein by this reference, is a lawful and valid easement.

11 (2) There is good cause to believe that Plaintiffs and their invitees and licensees,  
12 including without limitation prospective tenants, (collectively “Plaintiff Parties”) have rights to the  
13 use and enjoyment of the Reciprocal Driveway Easement.

14 (3) There is good cause to believe that Plaintiff Parties have rights to freely and easily  
15 enter and exit the Reciprocal Driveway Easement from and to the street (119<sup>th</sup> Place) with their  
16 vehicles by use of: (i) the existing curb cut for the Sweetheart Property (the “Sweetheart Curb  
17 Cut”); and (ii) the North-Easterly portion of the concrete driveway for Sweetheart Property (the  
18 “NE Sweetheart Driveway”).

19 (4) There is good cause to believe that Plaintiff Parties will suffer immediate and  
20 irreparable harm with respect to the Reciprocal Driveway Easement and such rights unless  
21 Defendants are restrained and enjoined by order of this Court.

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1 **PRELIMINARY INJUNCTION**

2 In accordance with the foregoing findings, and in granting the Motion in part, IT IS  
3 ORDERED that Defendants, and anyone acting under their authority and in privity with them,  
4 including without limitation tenants, invitees or other guests at the Sweetheart Property  
5 (collectively "Restrained Parties"), are preliminary enjoined from:

6 1. Blocking, interfering with, or preventing Plaintiff Parties' use of the Reciprocal  
7 Driveway Easement (including its entire length and access to and from the Street), whether by any  
8 obstructions, vehicles, gates, trashcans, landscaping, planters or otherwise.

9 a. In furtherance of this restriction, within ten (10) days of entry of this  
10 Order, Defendants, at their cost, shall trim, and thereafter maintain, the remaining  
11 landscaping to the East of the concrete driveway for the Sweetheart Property so that  
12 such landscaping does not encroach upon the Reciprocal Driveway Easement.

13 2. Blocking, interfering with, or preventing Plaintiff Parties' use of the Sweetheart  
14 Curb Cut and NE Sweetheart Driveway to freely and easily enter and exit the Reciprocal Driveway  
15 Easement from and to the street, whether by any obstructions, vehicles (including without  
16 limitation vehicles parked upon the NE Sweetheart Driveway), gates, trashcans, landscaping,  
17 planters or otherwise.

18 In furtherance of this restriction:

19 a. Restrained Parties shall not close the Wrought Iron Gate at the Northeast  
20 end of the Sweetheart Property such that it would prevent or otherwise interfere with  
21 vehicles freely and easily entering and exiting the Reciprocal Driveway Easement from and  
22 to the street by way of the Sweetheart Curb Cut and NE Sweetheart Driveway.

23 b. Restrained Parties shall not park vehicles, or position trashcans, on the street  
24 in a manner that would block the Sweetheart Curb Cut or portion thereof.

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c. Within ten (10) days of entry of this Order, Defendants, at their cost, shall remove any landscaping, and fill any planters, flanking the NE Sweetheart Driveway that would prevent or otherwise interfere with vehicles freely and easily entering and exiting the Reciprocal Driveway Easement from and to the street by way of the Sweetheart Curb Cut and NE Sweetheart Driveway.

3. Video recording, or otherwise positioning their security cameras in a manner that would capture, the structures located on the Park Property.

a. ~~In furtherance of this restriction, Defendants, upon written demand from Plaintiffs, shall provide screen shots of security cameras at the Sweetheart Property so that Plaintiffs can verify that structures located on the Park Property are not being recorded.~~

As to Plaintiffs’ requests for other relief, the Court finds and rules as follows:

A. Brick Wall Between Southern Portions of Park Property and Sweetheart Property.

Defendants have not explained or defended the rear brick wall and related extensions. They failed to submit any evidence. On this Motion, it is therefore undisputed that it is in part unpermitted and unlawful. The Court, however, requires precise admissible and competent evidence as to brick wall’s: (i) placement relative to the easement, length, and height; (ii) the status of the County’s Notice of Violation and related enforcement efforts; (iii) whether the County’s administrative jurisdiction is exclusive; (iii) the jurisdiction and ability of the Court on a preliminary injunction to order part of the wall removed or altered; and (iv) how the wall negatively impacts Plaintiffs’ use of the easement. The Court denies Plaintiffs’ Motion regarding the brick wall at this time without prejudice to a further and more complete showing on a renewed motion.

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B. Listing or Renting of any Unit located on the Sweetheart Property.

The Court denies without prejudice relief concerning the listing or renting of any unit located on the Sweetheart Property.

**IT IS SO ORDERED.**

Dated: 05/19/2023



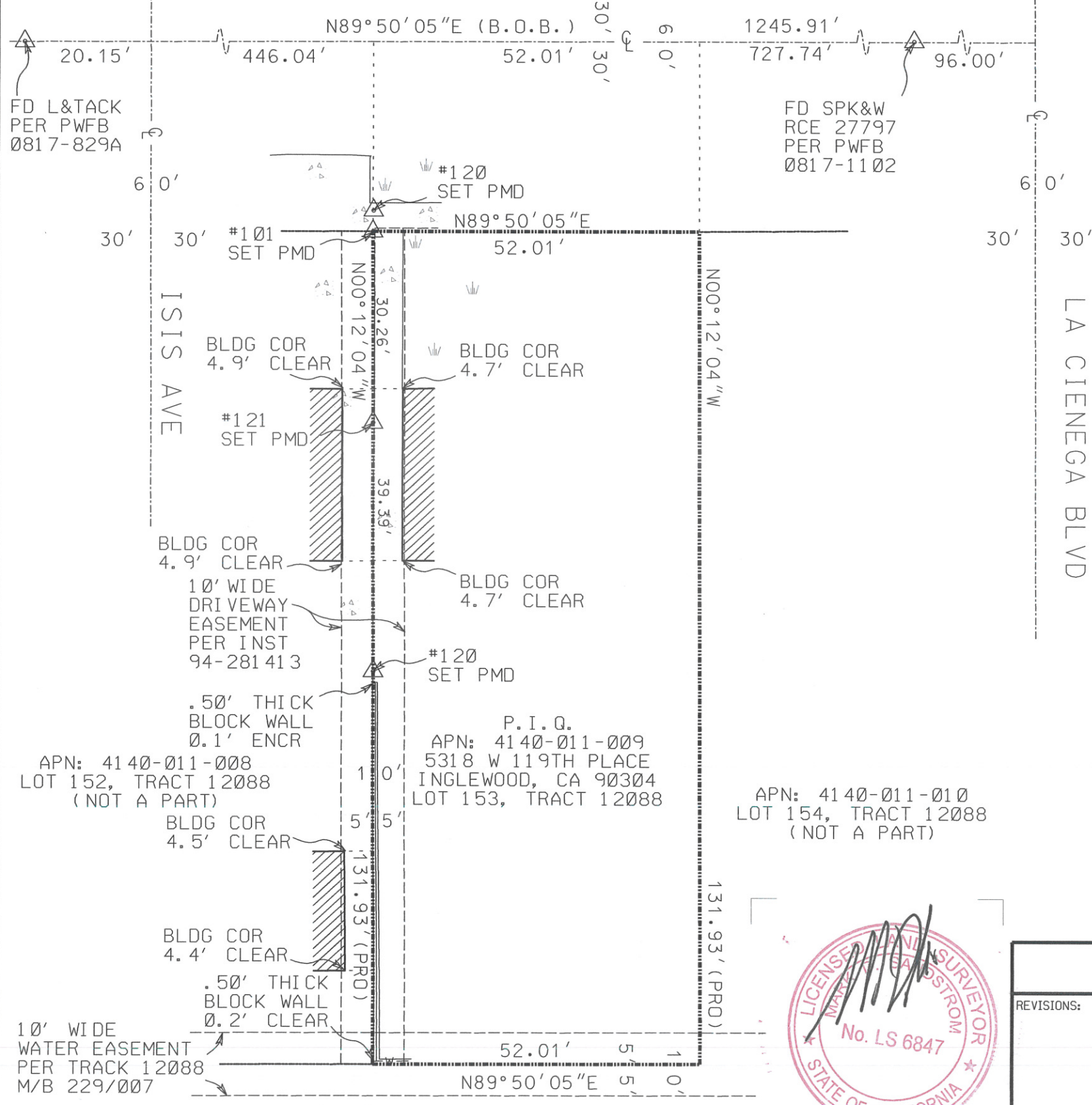
A handwritten signature in black ink, appearing to read "T. Dillon", is written over a horizontal line.

Hon. Timothy Patrick Dillon  
JUDGE OF THE SUPERIOR COURT  
Timothy Patrick Dillon / Judge



# **EXHIBIT A**

W 119TH PLACE



PROPERTY ADDRESS:

5318 W. 119TH PLACE  
INGLEWOOD, CA 90304

ASSESSOR'S PARCEL NO.:

4140-011-009 (LOS ANGELES COUNTY)

LEGAL DESCRIPTION:

LOT 153 OF TRACT NO. 12088 IN THE COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 229, PAGES 7 AND 8 OF MAPS, IN THE OFFICE OF THE RECORDER OF SAID COUNTY.

BASIS OF BEARINGS:

THE BEARING OF N 89° 50' 05" E ALONG THE CENTERLINE OF 119TH PLACE AS SHOWN ON TRACT NO. 12088 IN THE COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 229, PAGES 7 AND 8 OF MAPS, IN THE OFFICE OF THE RECORDER OF SAID COUNTY. WAS USED AS THE BASIS OF BEARINGS FOR THIS SURVEY.

NOTES:

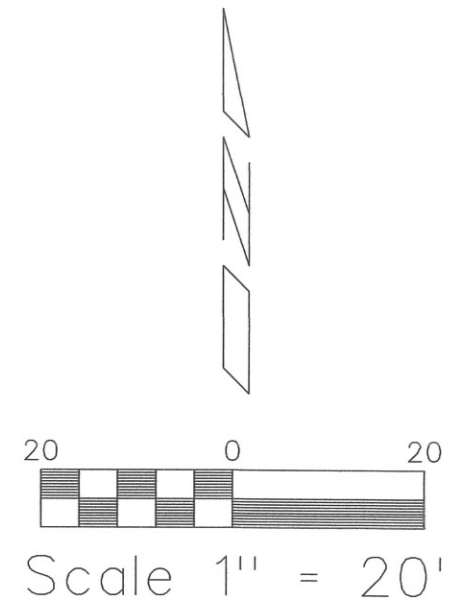
- 1) THIS SURVEY WAS PERFORMED WITHOUT BENEFIT OF A TITLE REPORT. EASEMENTS, IF ANY, ARE NOT SHOWN ON THIS MAP.
- 2) GROSS PARCEL AREA = 6,862 SQ. FT. / 0.16 ACRES

LIST OF ABBREVIATIONS:

B.O.B.	BASIS OF BEARING
ENCR	ENCROACHMENT
FD	FOUND
IP	IRON PIPE
L&T	LEAD & TACK
PMD	PAINT MARK DOT
PRO	PRORATED

LEGEND:

PROPERTY LINE:	
STREET CENTERLINE:	
EASEMENT:	
MONUMENT:	



PARTIAL BOUNDARY SURVEY

REVISIONS:	SURVEYED FOR:	SURVEYED BY:	SCALE:
	JUNG PARK 5318 W 119TH PLACE INGLEWOOD, CA 90304		1" = 20'
SURVEYED BY: JM, HC		<p><b>LAND &amp; AIR SURVEYING</b> BOUNDARY - TOPOGRAPHIC - ALTA. SURVEYS SUBDIVISIONS - PARCEL MAPS 22741 PACIFIC COAST HIGHWAY SUITE #400A MALIBU, CA 90265 BUSINESS (310) 456-9381 FAX (310) 456-9821</p>	JOB NO: PARK_J_122
DRAWN BY: AL			SURVEY DATE: 02/02/22
			SHEET: 1 OF 1

# **EXHIBIT B**


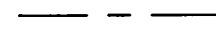
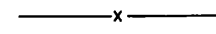
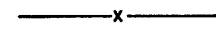
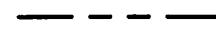

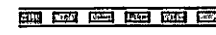
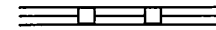
**CLIENT:**

PAUL SULLIVAN & ASSOCIATES  
 525 S DOUGLAS ST,  
 EL SEGUNDO, CA 90245

**JOB LOCATION:**

5322 W. 119TH PL,  
 INGLEWOOD, CA 90304  
 APN: 4150-011-008

**LINETYPES:**

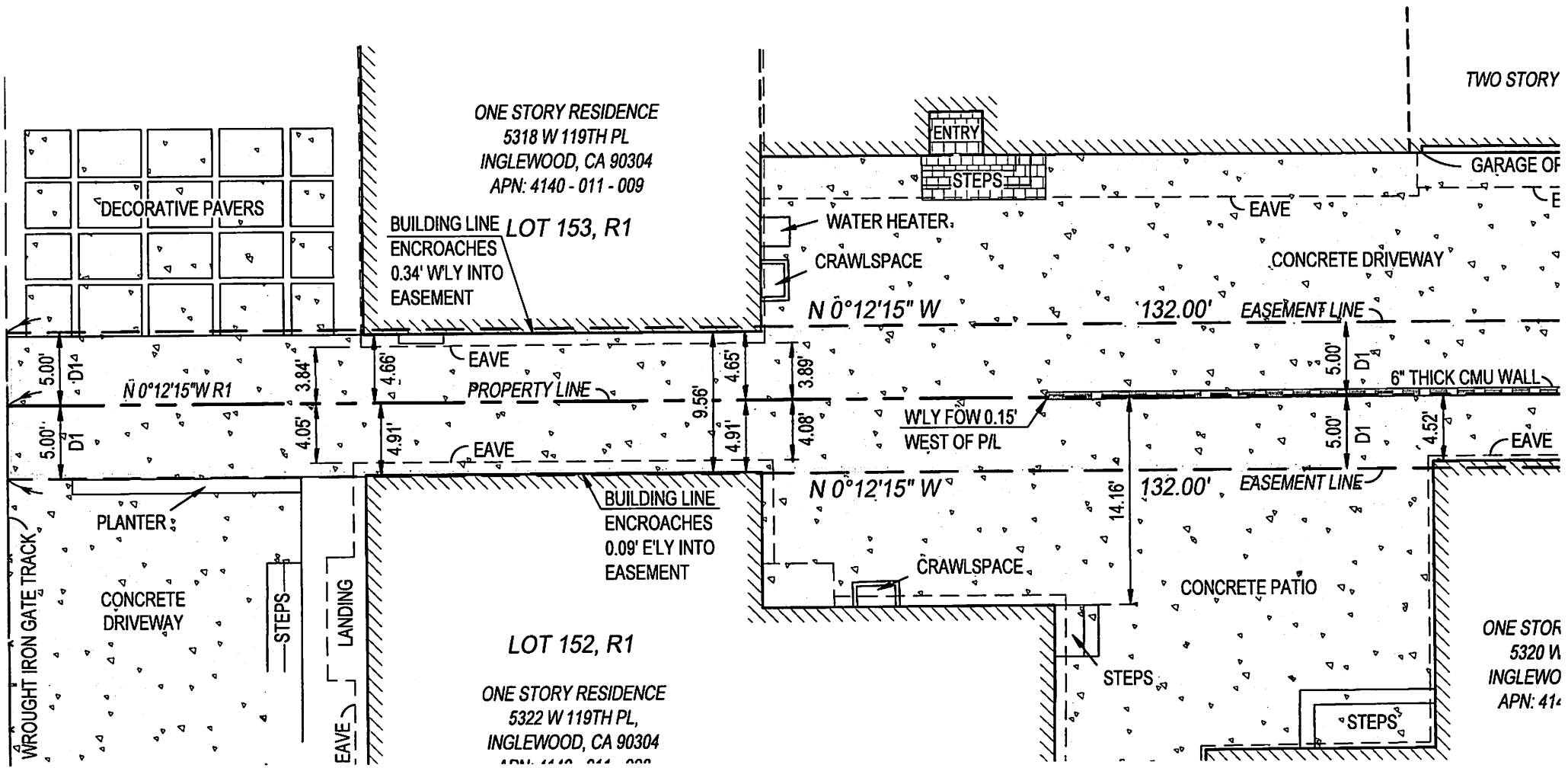
-  - BUILDING LINE
-  - CENTERLINE
-  - WROUGHT IRON FENCE
-  - WROUGHT IRON GATE TRACK
-  - PROPERTY LINE
-  - EASEMENT LINE
-  - WALL (SIZE AND TYPE AS NOTED)
-  - BOARD FENCE

**REFERENCES:**

- D1 - EASEMENT DEED RECORDED FEBRUARY 9, 1994  
 AS INSTRUMENT NO. 94-281413
- R1 - TRACT NO. 12088, M.B. 229-07/08
- R2 - PWFB 0817-967/968

**LEGAL DESCRIPTION:**

EASTERLY LINE OF LOT 152,  
 TRACT NO. 12088, M.B. 299-07/08



CASE NAME: Park v. Sofia Sweetheart, LLC	CASE NUMBER: 22STCV29381
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**PROOF OF ELECTRONIC SERVICE  
PROPOSED ORDER**

1. I am at least 18 years old and **not a party to this action.**

a. My residence or business address is *(specify)*:  
Verve Law Group, LLP, 5841 Beach Blvd., Buena Park, CA 90621

b. My electronic service address is *(specify)*: gracec@vervelaw.com

2. I electronically served the *Proposed Order (Cover Sheet)* with a proposed order in PDF format attached, and a proposed order in an editable word-processing format as follows:

a. On *(name of person served) (If the person served is an attorney, the party or parties represented should also be stated.)*:  
Paul Sullivan and Susan Rousier, Attorneys for Defendants Sofia Sweetheart, LLC; Lida Behnam; and Sofia Behnam

b. To *(electronic service address of person served)*: paul@sullivanlitigators.com; susan@sullivanlitigators

c. On *(date)*: May 15, 2023

Electronic service of the *Proposed Order (Cover Sheet)* with the attached proposed order in PDF format and service of the proposed order in an editable word-processing format on additional persons are described in an attachment.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: May 15, 2023

Grace Chung  
\_\_\_\_\_  
(TYPE OR PRINT NAME OF DECLARANT)

  
\_\_\_\_\_  
(SIGNATURE OF DECLARANT)

# EXHIBIT B

**SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES**

**Civil Division**

Central District, Stanley Mosk Courthouse, Department 73

**22STCV29381**

**JUNG PARK, et al. vs SOFIA SWEETHEART LLC., A  
CALIFORNIA LIMITED LIABILITY COMPANY, et al.**

May 5, 2023

9:58 AM

Judge: Honorable Timothy Patrick Dillon

CSR: None

Judicial Assistant: M. Y. Carino

ERM: None

Courtroom Assistant: E. Villanueva

Deputy Sheriff: None

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**APPEARANCES:**

For Plaintiff(s): No Appearances

For Defendant(s): No Appearances

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**NATURE OF PROCEEDINGS:**

Ruling on Submitted Matter Re: Motion for Preliminary Injunction (Res ID: 2334)

The Court, having taken the matter under submission on 05/04/2023 for Hearing on Motion for Preliminary Injunction (Res ID: 2334), now rules as follows:

The Motion for Preliminary Injunction (Res ID: 2334) filed by Young Park, Jung Park on 04/06/2023 is Granted in Part.

1. Defendants and anyone acting under their authority or in privity with them are preliminarily enjoined from blocking, interfering, or preventing access with any obstructions, vehicles, gates, trash cans, or otherwise Plaintiffs' full use and enjoyment the recorded easement. This includes the entire length of the easement with access to the street. The entire easement shall be kept free and clear of any and all obstructions. Plaintiffs should be permitted to enter and exit the easement from and to the street without obstruction or interference. Plaintiffs should be able to freely use and enjoy the lawful easement without interference. This includes the curb cut. Defendants' survey confirms the existence of the lawful and valid easement. The preliminary injunction order must be specific and definite as discussed at the hearing.

2. Within 10 days, Defendants shall trim the landscaping at edge of the easement so that the landscaping does not encroach onto the easement.

3. Defendants have not explained or defended the rear brick wall and related extensions. They failed to submit any evidence. On this motion, it is therefore undisputed that it is in part unpermitted and unlawful. The court, however, requires precise admissible and competent evidence as to its (i) placement relative to the easement, length, and height, (ii) the status of the County's notice of violation and related enforcement efforts and whether the County's administrative jurisdiction is exclusive, (iii) the jurisdiction and ability of the court on a

**SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES**

**Civil Division**

Central District, Stanley Mosk Courthouse, Department 73

**22STCV29381**

**JUNG PARK, et al. vs SOFIA SWEETHEART LLC., A  
CALIFORNIA LIMITED LIABILITY COMPANY, et al.**

May 5, 2023

9:58 AM

Judge: Honorable Timothy Patrick Dillon

CSR: None

Judicial Assistant: M. Y. Carino

ERM: None

Courtroom Assistant: E. Villanueva

Deputy Sheriff: None

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preliminary injunction to order part of the wall removed or altered, and (iv) how the wall negatively impacts Plaintiffs' use of the easement. The court denies Plaintiffs' motion regarding the wall at this time without prejudice to a further and more complete showing on a renewed motion.

4. Defendants are preliminarily enjoined from video recording or otherwise aiming their security cameras at the structures located on the Park property.

5. At this point, the court denies relief concerning the listing or renting of any unit located on Defendants' property.

Plaintiffs have satisfied all the elements required for issuance of the preliminary injunction.

The parties are ordered to meet and confer regarding the form of a preliminary injunction order along the lines directed by the court at the hearing.

Plaintiffs shall submit their proposed order within 10 days. Plaintiffs are ordered to give notice. Certificate of Mailing is attached.



# EXHIBIT C

1 PAUL F. SULLIVAN & ASSOCIATES  
PAUL F. SULLIVAN, State Bar No. 148969  
2 [paul@sullivanlitigators.com](mailto:paul@sullivanlitigators.com)  
3 SUSAN ROUSIER, State Bar No. 193545  
[susan@sullivanlitigators.com](mailto:susan@sullivanlitigators.com)  
4 525 South Douglas Street, Suite 210  
El Segundo, California 90245  
Telephone: (310) 341-2926  
5 Facsimile: (310) 341-2928

6 Attorneys for Defendants, SOFIA SWEETHEART LLC, LIDA BEHNAM, and SOFIA  
BEHNAM  
7

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
9 **COUNTY OF LOS ANGELES, CENTRAL DISTRICT**

10  
11 JUNG PARK, an individual; and YOUNG  
PARK, an individual,

12 Plaintiffs,

13 vs.  
14

15 SOFIA SWEETHEART LLC, a California  
limited liability company; LIDA BEHNAM,  
an individual; and SOFIA BEHNAM, an  
16 individual; and DOES 1 through 20, inclusive,

17 Defendants.  
18

Case No. 22STCV29381

**RESPONSES OF DEFENDANT LIDA  
BEHNAM TO SPECIAL  
INTERROGATORIES PROPOUNDED BY  
PLAINTIFF JUNG PARK**

**SET NO.: ONE**

The Hon. Timothy Patrick Dillon, Dept. 73  
Action Filed: 09/09/22

Discovery Cutoff: 03/22/24  
Motion Cutoff: 04/05/24  
Trial Date: 04/22/24

19 **PROPOUNDING PARTY: Plaintiff, JUNG PARK**

20 **RESPONDING PARTY: Defendant, LIDA BEHNAM**

21 **SET NO.: ONE**

22 COMES NOW Defendant LIDA BEHNAM, and responds to Special Interrogatories (Set  
23 One) propounded by Plaintiff as follows:

24 Each of the following responses is rendered and based upon information in possession of  
25 the responding party at the time of this response as permitted by statute or stipulation of the  
26 parties; investigation of this responding party's attorneys and agents will continue to and  
27 throughout the trial/arbitration of this action. We, therefore, specifically reserve the right at the  
28 time of trial to introduce any evidence from any source which may hereafter be discovered and

1 testimony from any witnesses whose identities may hereafter be discovered.

2 If any information has unintentionally been omitted from these responses, the interrogated  
3 party reserves the right to apply for relief so as to permit the insertion of the omitted data to the  
4 responses.

5 We rely upon well-established California authority to the effect that interrogatories cannot  
6 unilaterally be denominated continuing in nature, and serve notice that we will not voluntarily  
7 further respond to these interrogatories if additional information is acquired by us after these  
8 responses are served. Smith v. Superior Court (1961) 189 Cal.App.2d 6; 11 Cal.Rptr. 165.

9 These introductory comments shall apply to each and every answer given herein, and shall  
10 be incorporated by reference as though fully set forth on the following pages.

11 **RESPONSES / OBJECTIONS**

12 **SPECIAL INTERROGATORY NO. 1:**

13 Identify the date YOU purchased Sweetheart Property.

14 As used in these Interrogatories, the terms, “YOU” or “YOUR” shall mean and refer to  
15 Defendant LIDA BEHNAM, including any PERSON acting on YOUR behalf.

16 As used in these Interrogatories, the terms “PERSON” and “PERSONS” shall mean any  
17 natural person, corporation, partnership, joint venture, association, sole proprietorship, company,  
18 group, organization, trust, estate, business or governmental entity or agency (public or private),  
19 and any entity of any description that has a separate identity, recognized in law or in fact to have  
20 legal rights and obligations. Any reference to a PERSON that is not a natural person includes its  
21 present and former officer, executives, partners, directors, trustees, employees, attorneys, agents,  
22 representatives, and all other PERSONS acting or purporting to act on behalf of the person or  
23 entity, and also its subsidiaries, affiliates, divisions, predecessors, and successors in interest.

24 As used in these Interrogatories, the term “Sweetheart Property” shall mean the real  
25 property with APN 4140-011-008 which, without limitation, has the addresses 5322 and 5320  
26 West 119th Place, Inglewood, California 90304.

27 **RESPONSE TO SPECIAL INTERROGATORY NO. 1:**

28 December 19, 2016

1 **SPECIAL INTERROGATORY NO. 2:**

2 IDENTIFY all owners, of any interest, of the Sweetheart Property.

3 As used in these Interrogatories, the terms “IDENTIFY,” “IDENTITY” or  
4 “IDENTIFICATION” with respect to PERSONS shall mean and require YOU to state the full  
5 name and the last known address, telephone number, and email address, and business title, if any.

6 **RESPONSE TO SPECIAL INTERROGATORY NO. 2:**

7 Lida Behnam, Sofia Behnam, Sofia Sweetheart, LLC

8 **SPECIAL INTERROGATORY NO. 3:**

9 IDENTIFY each and every address located on APN 4140-011-008

10 **RESPONSE TO SPECIAL INTERROGATORY NO. 3:**

11 5322 and 5320 West 119th Place, Inglewood, California 90304.

12 **SPECIAL INTERROGATORY NO. 4:**

13 IDENTIFY each and every Airbnb listing by ID number, website address, and physical  
14 address for any and all units located on the Sweetheart Property from 2020 to present.

15 **RESPONSE TO SPECIAL INTERROGATORY NO. 4:**

16 Responding Party declines to provide this confidential information.

17 **SPECIAL INTERROGATORY NO. 5:**

18 IDENTIFY all PERSONS who have information concerning each and every Airbnb listing  
19 for any and all units located on the Sweetheart Property from 2020 to the present.

20 **RESPONSE TO SPECIAL INTERROGATORY NO. 5:**

21 Lida Behnam, 5322 and 5320 West 119th Place, Inglewood, California 90304.

22 **SPECIAL INTERROGATORY NO. 6:**

23 IDENTIFY all DOCUMENTS which reflect, evidence, or show each and every Airbnb  
24 listing for any and all units located on the Sweetheart Property from 2020 to present.

25 As used in these Interrogatories, the terms “IDENTIFY,” “IDENTITY” or  
26 “IDENTIFICATION” with respect to DOCUMENTS shall mean and require YOU to identify the  
27 name of the DOCUMENT, its author, the date, the recipients, and the location of the  
28 DOCUMENT.

1 “DOCUMENT” and “DOCUMENTS” shall mean and refer to any written, recorded  
2 (electronically or otherwise), printed or graphic matter, however produced or reproduced, of any  
3 kind or description, whether sent or received or neither, including originals, copies and non-  
4 identical copies thereof (whether different from the original because of marginal notes, other  
5 material inserted therein or attached thereto, or otherwise), and drafts and both sides thereof.

6 DOCUMENTS include but are not limited to papers, books, checks, margin calls, records,  
7 letters, correspondence, telegrams, cables, telex messages, fax messages, memoranda, notes,  
8 notations, work papers, work sheets, transcripts, minutes, reports, recordings of telephone and  
9 other conversations or other interviews (or of conferences or other meetings), affidavits,  
10 statements, summaries, opinions, reports, studies, analyses, evaluations, contracts, agreements,  
11 ledgers, journals, statistical records, desk calendars, appointment books, diaries, lists, tabulations,  
12 sound recordings, computer printouts, data processing records, microfilm, computer disks,  
13 electronic memoranda and files (including email or similar electronic messages or memos and  
14 word processing, database and spreadsheet files), photographs, drawings (whether hand,  
15 mechanically, or electronically generated), maps, charts, accounts, financial statements and reports  
16 thereof, all records kept by electronic, photographic or mechanical means, pleadings, and all other  
17 tangible things in which words, figures, notations or sounds are recorded in writing or by any  
18 other means, however denominated, and any such material underlying, supporting or used in the  
19 preparation thereof.

20 **RESPONSE TO SPECIAL INTERROGATORY NO. 6:**

21 Responding Party declines to provide this confidential information.

22 **SPECIAL INTERROGATORY NO. 7:**

23 IDENTIFY each and every third-party rental listing, other than Airbnb, by ID number,  
24 website address, and physical address for any and all units located on the Sweetheart Property  
25 from 2020 to the present.

26 **RESPONSE TO SPECIAL INTERROGATORY NO. 7:**

27 Responding Party declines to provide this confidential information.

28 ///

1 **SPECIAL INTERROGATORY NO. 8:**

2 IDENTIFY all PERSONS who have information concerning each and every third-party  
3 rental listing, other than Airbnb, for any and all units located on the Sweetheart Property from  
4 2020 to the present.

5 **RESPONSE TO SPECIAL INTERROGATORY NO. 8:**

6 Lida Behnam, 5322 and 5320 West 119th Place, Inglewood, California 90304.

7 **SPECIAL INTERROGATORY NO. 9:**

8 IDENTIFY all DOCUMENTS which reflect, evidence, or show each and every third-party  
9 rental listing, other than Airbnb, for any and all units located on the Sweetheart Property from  
10 2020 to the present.

11 **RESPONSE TO SPECIAL INTERROGATORY NO. 9:**

12 Responding Party declines to provide this confidential information.

13 **SPECIAL INTERROGATORY NO. 10:**

14 IDENTIFY the length of stay for each and every rental of any and all units located on the  
15 Sweetheart Property from 2020 to the present, by dates of stay, third-party rental listing company  
16 used, ID number, website address, and physical address.

17 **RESPONSE TO SPECIAL INTERROGATORY NO. 10:**

18 Responding Party declines to provide this confidential information.

19 **SPECIAL INTERROGATORY NO. 11:**

20 IDENTIFY all PERSONS who have information concerning the length(s) of stay for each  
21 and every rental of any and all units located on the Sweetheart Property from 2020 to the present.

22 **RESPONSE TO SPECIAL INTERROGATORY NO. 11:**

23 Lida Behnam, 5322 and 5320 West 119th Place, Inglewood, California 90304.

24 **SPECIAL INTERROGATORY NO. 12:**

25 IDENTIFY all DOCUMENTS which reflect, evidence, or show the length(s) of stay for  
26 each and every rental of any and all units located on the Sweetheart Property from 2020 to the  
27 present.

28 ///

1 **RESPONSE TO SPECIAL INTERROGATORY NO. 12:**

2 Responding Party declines to provide this confidential information.

3 **SPECIAL INTERROGATORY NO. 13:**

4 IDENTIFY any and all complaints YOU received concerning renter(s) of any and all units  
5 located on the Sweetheart Property from 2020 to the present by the name of complainant, date, and  
6 how YOU received it.

7 **RESPONSE TO SPECIAL INTERROGATORY NO. 13:**

8 Any and all complaints regarding Responding Party's renters of units on the Sweetheart  
9 Property were lodged by Plaintiffs.

10 **SPECIAL INTERROGATORY NO. 14:**

11 IDENTIFY all PERSONS who have information any and all complaints YOU received  
12 concerning renter(s) of any and all units located on the Sweetheart Property from 2020 to the  
13 present.

14 **RESPONSE TO SPECIAL INTERROGATORY NO. 14:**

15 Lida Behnam, 5322 and 5320 West 119th Place, Inglewood, California 90304.

16 **SPECIAL INTERROGATORY NO. 15:**

17 IDENTIFY all DOCUMENTS which reflect, evidence, or show any and all complaints  
18 YOU received concerning renter(s) of any and all units located on the Sweetheart Property from  
19 2020 to the present.

20 **RESPONSE TO SPECIAL INTERROGATORY NO. 15:**

21 Any and all complaints regarding Responding Party's renters of units on the Sweetheart  
22 Property were lodged by Plaintiffs who have equal access to documentation for said complaints.

23 **SPECIAL INTERROGATORY NO. 16:**

24 State the date YOU extended the brick wall between the Sweetheart Property and Park  
25 Property.

26 As used in these Interrogatories, the term "Park Property" shall mean Plaintiffs' property  
27 located at 5318 West 119th Place, Inglewood, California 90304.

28

1 **RESPONSE TO SPECIAL INTERROGATORY NO. 16:**

2 Responding Party obtained permits for the brick wall and all extensions which were  
3 inspected and approved by the proper governmental agencies. The brick wall has been in place  
4 since 1946 and the extension was permitted in 2019.

5 **SPECIAL INTERROGATORY NO. 17:**

6 IDENTIFY the PERSON(S) or company used to extend the brick wall between Sweetheart  
7 Property and Park Property.

8 **RESPONSE TO SPECIAL INTERROGATORY NO. 17:**

9 Velesques Construction.

10 **SPECIAL INTERROGATORY NO. 18:**

11 IDENTIFY the date YOU extended the height of the brick wall between the Sweetheart  
12 Property and Park Property with vinyl extensions.

13 **RESPONSE TO SPECIAL INTERROGATORY NO. 18:**

14 Responding Party obtained permits for the brick wall and all extensions which were  
15 inspected and approved by the proper governmental agencies. The brick wall has been in place  
16 since 1946 and the extension was permitted in 2019.

17 **SPECIAL INTERROGATORY NO. 19:**

18 IDENTIFY the PERSON(S) or company used to extend the height of the brick wall  
19 between the Sweetheart Property and Park Property.

20 **RESPONSE TO SPECIAL INTERROGATORY NO. 19:**

21 Velesques Construction.

22 **SPECIAL INTERROGATORY NO. 20:**

23 State the date YOU installed a metal gate from the brick wall between the Sweetheart  
24 Property and Park Property to structure(s) on the Sweetheart Property.

25 **RESPONSE TO SPECIAL INTERROGATORY NO. 20:**

26 The Interrogatory is irrelevant. The metal gate is on Responding Party's property, her front  
27 lawn and apron. It does not affect the driveway and was properly permitted.

28 ///



1 **SPECIAL INTERROGATORY NO. 21:**

2 IDENTIFY the PERSON(S) or company used to install a metal gate from the brick wall  
3 between the Sweetheart Property and Park Property to structure(s) on the Sweetheart Property.

4 **RESPONSE TO SPECIAL INTERROGATORY NO. 21:**

5 The Interrogatory is irrelevant. The metal gate is on Responding Party's property, her front  
6 lawn and apron. It does not affect the driveway and was properly permitted.

7 **SPECIAL INTERROGATORY NO. 22:**

8 State the date YOU extended the height of the metal gate from the brick wall between the  
9 Sweetheart Property and Park Property to structure(s) on the Sweetheart Property with blue tarp.

10 **RESPONSE TO SPECIAL INTERROGATORY NO. 22:**

11 The Interrogatory is irrelevant. The metal gate is on Responding Party's property, her front  
12 lawn and apron. It does not affect the driveway and was properly permitted.

13 **SPECIAL INTERROGATORY NO. 23:**

14 IDENTIFY the PERSON(S) or company used to extend the height of the metal gate from  
15 the brick wall between the Sweetheart Property and Park Property to structure(s) on the  
16 Sweetheart Property driveway.

17 **RESPONSE TO SPECIAL INTERROGATORY NO. 23:**

18 The Interrogatory is irrelevant. The metal gate is on Responding Party's property, her front  
19 lawn and apron. It does not affect the driveway and was properly permitted.

20 **SPECIAL INTERROGATORY NO. 24:**

21 State the date YOU installed a partial chain link gate at the front of the Sweetheart  
22 Property driveway.

23 **RESPONSE TO SPECIAL INTERROGATORY NO. 24:**

24 Responding Party installed the partial chain link gate at the front of the Sweetheart  
25 Property driveway to control Plaintiffs' trespass onto Responding Party's private property.

26 **SPECIAL INTERROGATORY NO. 25:**

27 IDENTIFY the PERSON(S) or company used to install a partial chain link gate at the front  
28 of the Sweetheart Property driveway.

1 **RESPONSE TO SPECIAL INTERROGATORY NO. 25:**

2 The Interrogatory is irrelevant. The partial chain gate is on Responding Party's property,  
3 and was installed to control Plaintiffs' trespass onto Responding Party's private property.

4 **SPECIAL INTERROGATORY NO. 26:**

5 State the date YOU installed a rolling gate at the front of the Sweetheart Property  
6 driveway.

7 **RESPONSE TO SPECIAL INTERROGATORY NO. 26:**

8 Approximately June 2022.

9 **SPECIAL INTERROGATORY NO. 27:**

10 IDENTIFY the PERSON(S) or company used to install a rolling gate at the front of the  
11 Sweetheart Property driveway.

12 **RESPONSE TO SPECIAL INTERROGATORY NO. 27:**

13 The Interrogatory is irrelevant. The rolling gate is on Responding Party's property and was  
14 installed to control Plaintiffs' trespass onto Responding Party's private property.

15 **SPECIAL INTERROGATORY NO. 28:**

16 State the date(s) YOU planted landscaping along the Reciprocal Driveway Easement on  
17 the side of the Sweetheart Property Driveway.

18 As used in these Interrogatories, the term "Reciprocal Driveway Easement" that easement  
19 which runs between Plaintiffs' property located at 5318 West 119th Place, Inglewood, California  
20 90304 (the "Park Property") and Defendants' neighboring property located at 5322 and 5320 West  
21 119th Place Inglewood, California 90304 with APN 4140-011-008 ("Sweetheart Property"),  
22 recorded in the Recorder's Office of Los Angeles County on February 9, 1994 as Recorder No.  
23 94-281-413.

24 **RESPONSE TO SPECIAL INTERROGATORY NO. 28:**

25 Summer of 2021.

26 **SPECIAL INTERROGATORY NO. 29:**

27 IDENTIFY the PERSON(s) or company used to plant landscaping along the Reciprocal  
28 Driveway Easement on the side of the Sweetheart Property driveway.

1 **RESPONSE TO SPECIAL INTERROGATORY NO. 29:**

2 The Interrogatory is irrelevant. The landscaping is on Responding Party's property and  
3 was installed to control Plaintiffs' trespass onto Responding Party's private property.

4 **SPECIAL INTERROGATORY NO. 30:**

5 State the number of trashcans/recycling bins YOU have contracted with Waste  
6 Management for to service the Sweetheart Property.

7 **RESPONSE TO SPECIAL INTERROGATORY NO. 30:**

8 The Interrogatory is irrelevant.

9 **SPECIAL INTERROGATORY NO. 31:**

10 State the number of Waste Management trashcans/recycling bins currently on the  
11 Sweetheart Property.

12 **RESPONSE TO SPECIAL INTERROGATORY NO. 31:**

13 The Interrogatory is irrelevant.

14 **SPECIAL INTERROGATORY NO. 32:**

15 State by license plate number, make, and model all vehicles YOU have owned from 2020  
16 through the present.

17 **RESPONSE TO SPECIAL INTERROGATORY NO. 32:**

18 The Interrogatory is irrelevant. The subject incidents do not involve a motor vehicle  
19 accident or any claim for motor vehicle negligence.

20 **SPECIAL INTERROGATORY NO. 33:**

21 IDENTIFY YOUR all name(s)/handle(s) and profile number(s) used by YOU on  
22 Nextdoor.com from 2020 through the present.

23 ///  
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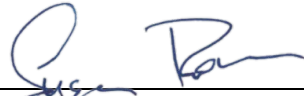
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**RESPONSE TO SPECIAL INTERROGATORY NO. 33:**

Use of social media involves the Constitutional right to freedom of speech and Responding Party's private information.

DATED: June 20, 2023

PAUL F. SULLIVAN & ASSOCIATES

By:   
\_\_\_\_\_  
PAUL F. SULLIVAN  
Attorneys for Defendants, SOFIA SWEETHEART  
LLC, LIDA BEHNAM, and SOFIA BEHNAM

VERIFICATION  
TO  
FOLLOW

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**PROOF OF SERVICE**

**PARK vs. SOFIA SWEETHEART LLC [6001-316706]  
Case No. 22STCV29381**

**STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Los Angeles, State of California. My business address is 525 South Douglas Street, Suite 210, El Segundo, CA 90245.

On June 20, 2023, I served true copies of the following document(s) described as **RESPONSES OF DEFENDANT LIDA BEHNAM TO SPECIAL INTERROGATORIES PROPOUNDED BY PLAINTIFF JUNG PARK (SET ONE)** on the interested parties in this action as follows:

Jeffrey T. Gwynn, Esq.  
Alexander J. Chang, Esq.  
Sara B. Wang, Esq.  
VERVE LAW GROUP  
5841 Beach Boulevard  
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**BY E-MAIL OR ELECTRONIC TRANSMISSION:** I caused a copy of the document(s) to be sent from e-mail address debra@sullivanlitigators.com to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on June 20, 2023, at El Segundo, California.

  
DEBRA E. KAELIN

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VERIFICATION

PARK vs. SOFIA SWEETHEART LLC [6001-316706]  
Case No. 22STCV29381

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I have read the foregoing **RESPONSES OF DEFENDANT LIDA BEHNAM TO SPECIAL INTERROGATORIES PROPOUNDED BY PLAINTIFF JUNG PARK** and know its contents.

I am a party to this action. The matters stated in the foregoing document are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

I am \_\_\_\_\_, a party to this action, and am authorized to make this verification for and on its behalf, and I make this verification for that reason.

I am informed and believe and on that ground allege that the matters stated in the foregoing document are true.


The matters stated in the foregoing document are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

I am one of the attorneys for \_\_\_\_\_, a party to this action. Such party is absent from the county where such attorneys have their offices, and I make this verification for and on behalf of that party for that reason. I am informed and believe and on that ground allege that the matters stated in the foregoing document are true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on Jun 22, 2023, at Inglewood, California.

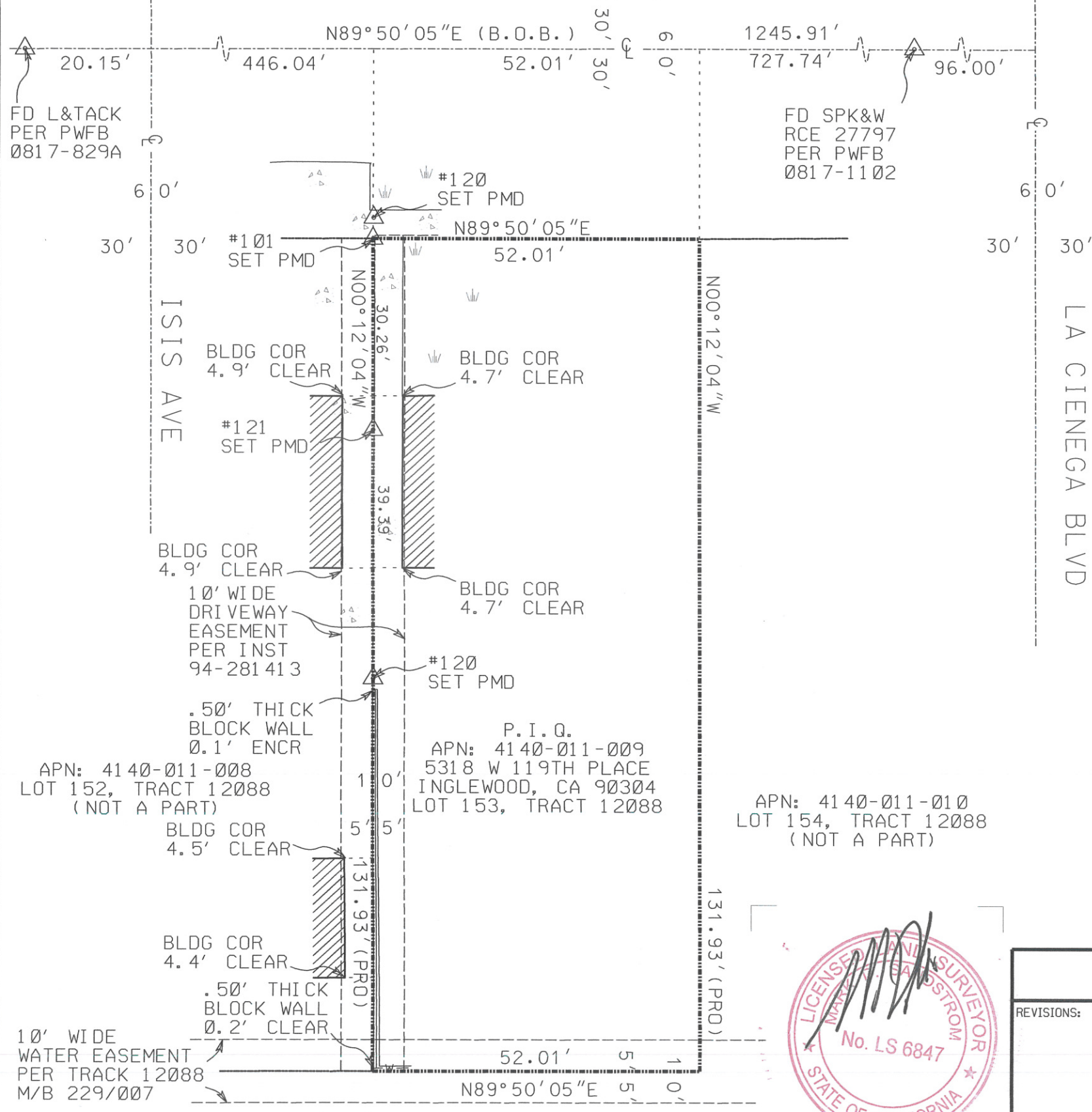
LIDA BEHNAM  
Print Name of Signatory

  
LIDA BEHNAM (Jun 22, 2023 10:30 PDT)  
Signature

# EXHIBIT D



W 119TH PLACE



FD L&TACK  
PER PWFB  
0817-829A

FD SPK&W  
RCE 27797  
PER PWFB  
0817-1102

PROPERTY ADDRESS:

5318 W. 119TH PLACE  
INGLEWOOD, CA 90304

ASSESSOR'S PARCEL NO.:

4140-011-009 (LOS ANGELES COUNTY)

LEGAL DESCRIPTION:

LOT 153 OF TRACT NO. 12088 IN THE COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 229, PAGES 7 AND 8 OF MAPS, IN THE OFFICE OF THE RECORDER OF SAID COUNTY.

BASIS OF BEARINGS:

THE BEARING OF N 89° 50' 05" E ALONG THE CENTERLINE OF 119TH PLACE AS SHOWN ON TRACT NO. 12088 IN THE COUNTY OF LOS ANGELES, STATE OF CALIFORNIA, AS PER MAP RECORDED IN BOOK 229, PAGES 7 AND 8 OF MAPS, IN THE OFFICE OF THE RECORDER OF SAID COUNTY. WAS USED AS THE BASIS OF BEARINGS FOR THIS SURVEY.

NOTES:

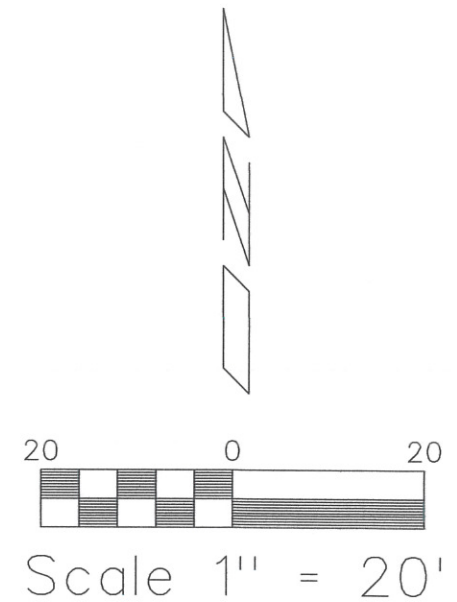
- 1) THIS SURVEY WAS PERFORMED WITHOUT BENEFIT OF A TITLE REPORT. EASEMENTS, IF ANY, ARE NOT SHOWN ON THIS MAP.
- 2) GROSS PARCEL AREA = 6,862 SQ. FT. / 0.16 ACRES

LIST OF ABBREVIATIONS:

B.O.B.	BASIS OF BEARING
ENCR	ENCROACHMENT
FD	FOUND
IP	IRON PIPE
L&T	LEAD & TACK
PMD	PAINT MARK DOT
PRO	PRORATED

LEGEND:

PROPERTY LINE:	-----
STREET CENTERLINE:	-----C-----
EASEMENT:	-----
MONUMENT:	△



PARTIAL BOUNDARY SURVEY

REVISIONS:	SURVEYED FOR:	SURVEYED BY:	SCALE:
	JUNG PARK 5318 W 119TH PLACE INGLEWOOD, CA 90304		1" = 20'
SURVEYED BY: JM, HC		<p><b>LAND &amp; AIR SURVEYING</b> BOUNDARY - TOPOGRAPHIC - ALTA. SURVEYS SUBDIVISIONS - PARCEL MAPS 22741 PACIFIC COAST HIGHWAY SUITE #400A MALIBU, CA 90265 BUSINESS (310) 456-9381 FAX (310) 456-9821</p>	JOB NO: PARK_J_122
DRAWN BY: AL			SURVEY DATE: 02/02/22
			SHEET: 1 OF 1

# EXHIBIT E

**EASEMENT PLANIMETRIC TOPOGRAPHIC SURVEY**



**CLIENT:**

PAUL SULLIVAN & ASSOCIATES  
 525 S DOUGLAS ST  
 EL SEGUNDO, CA 90245

**JOB LOCATION:**

5322 W. 119TH PL.  
 INGLENWOOD, CA 90304  
 APN: 4150-011-008

**LINE TYPES:**

- BUILDING LINE
- CENTERLINE
- WROUGHT IRON FENCE
- WROUGHT IRON GATE TRACK
- PROPERTY LINE
- EASEMENT LINE
- WALL (SIZE AND TYPE AS NOTED)
- BOARD FENCE

**ABBREVIATIONS:**

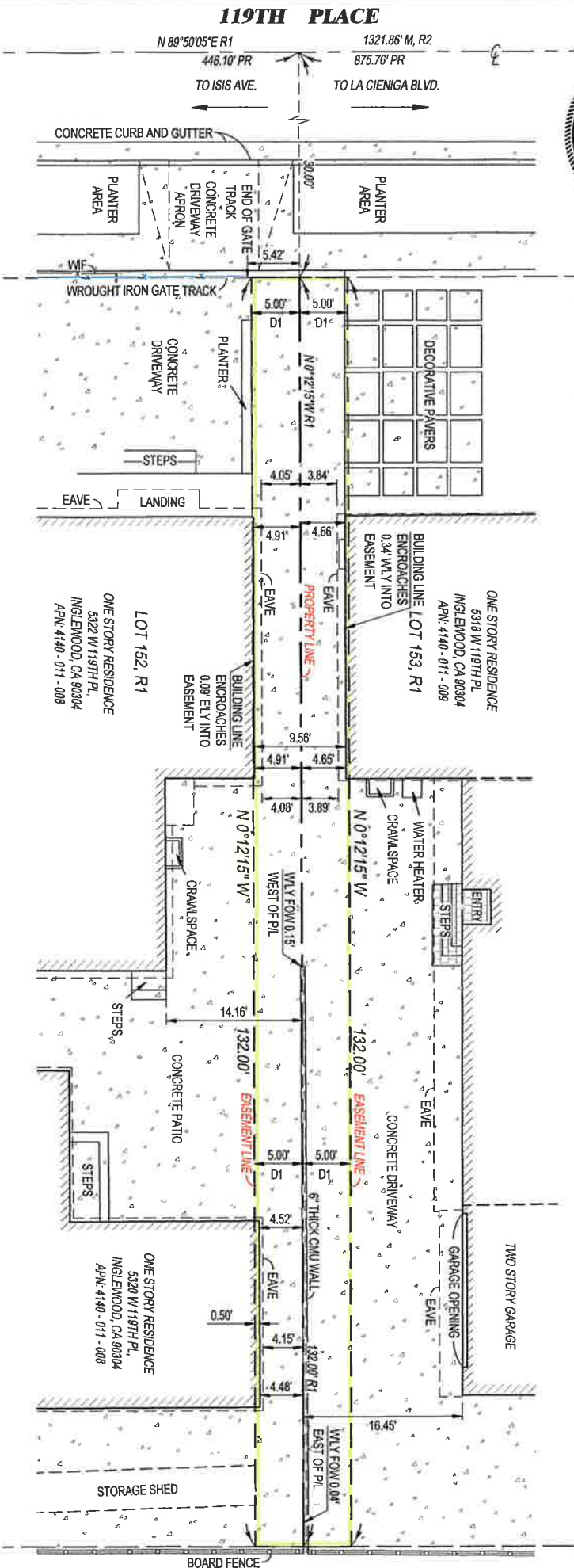
- CL CENTERLINE
- CF CALCULATED FROM
- CMU CONCRETE MASONRY UNIT
- ELY EASTERLY
- FWW FACE OF WALL
- M MEASURED
- PL PROPERTY LINE
- PLY WESTERLY
- WF WROUGHT IRON FENCE

**REFERENCES:**

- D1 - EASEMENT DEED RECORDED FEBRUARY 9, 1994  
 AS INSTRUMENT NO. 94-281413
- R1 - TRACT NO. 12088, M.B. 229-0708
- R2 - PMFB 0817-907968

**LEGAL DESCRIPTION:**

- EASTERLY LINE OF LOT 152,  
 TRACT NO. 12088, M.B. 229-0708



77045 SUNBURST ST., NORTHridge CA, 91325 P: 818-993-5811  
 mail@svrway.com